

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**PANTAURUS LLC,**

Plaintiff,

v.

**ADOBE SYSTEMS INCORPORATED,**

Defendant.

Case No. 1:14-cv-512

**PATENT CASE**

**JURY TRIAL DEMANDED**

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**PLAINTIFF PANTAURUS LLC'S ANSWER TO ANSWER, AFFIRMATIVE  
DEFENSES AND COUNTERCLAIMS  
OF DEFENDANT ADOBE SYSTEMS INCORPORATED**

PanTaurus LLC (“Plaintiff” or “PanTaurus”) files this Answer to the Counterclaims asserted against PanTaurus by Defendant Adobe Systems Incorporated (“Defendant” or “Adobe”). Any allegation or defense not expressly admitted herein is denied.

**ANSWER TO COUNTERCLAIMS ALLEGATIONS**

Plaintiff admits that Defendant purports to assert counterclaims against Plaintiff.

**PARTIES AND ACTION**

1. Plaintiff admits the allegations of paragraph 1.
2. Plaintiff admits the allegations of paragraph 2.
3. Plaintiff admits that it owns United States Patent No. 6,272,533 (“the ’533 Patent”), titled “Secure Computer System And Method Of Providing Secure Access To A Computer System Including A Stand Alone Switch Operable To Inhibit Data Corruption On A Storage Device.
4. Plaintiff admits the allegations of paragraph 4.

## **JURISDICTION**

5. In response to Defendant's incorporation by reference of the allegations of Paragraphs 1 through 4 of its Counterclaims, Plaintiff incorporates by reference its responses to Paragraphs 1 through 4 above.

6. Plaintiff admits that this Court has subject matter jurisdiction over this matter.

7. Plaintiff admits that an actual controversy exists between the parties, otherwise denied.

8. Plaintiff admits that venue is proper in this District for purposes of this matter.

## **ANSWER TO COUNT ONE DECLARATION OF NON-INFRINGEMENT OF THE '533 PATENT**

9. In response to Defendant's incorporation by reference of Paragraphs 1 through 8 of its Counterclaims, Plaintiff incorporates by reference its responses to Paragraphs 1 through 8 above.

10. Plaintiff admits a present genuine and justiciable controversy exists between the parties, otherwise denied.

11. Plaintiff denies the allegations of paragraph 11.

12. Plaintiff denies the allegations of paragraph 12.

## **ANSWER TO COUNT TWO DECLARATION OF INVALIDITY OF THE '533 PATENT**

13. In response to Defendant's incorporation by reference of Paragraphs 1 through 12 of its Counterclaims, Plaintiff incorporates by reference its responses to Paragraphs 1 through 12 above.

14. Plaintiff admits a present genuine and justiciable controversy exists between the parties, otherwise denied.

15. Plaintiff denies the allegations of paragraph 15.

15. Plaintiff denies the allegations of paragraph 16.

**ANSWER TO PRAYER FOR RELIEF**

Plaintiff denies that Defendant is entitled to relief of any kind on its Counterclaims.

**JURY DEMAND**

Defendant's Jury Demand is an averment to which no responsive pleading is required. Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of all issues so triable by right.

WHEREFORE, Plaintiff prays for the relief set forth in its Complaint and that Defendant's Counterclaims, and all relief requested by Defendant, be denied.

Dated: January 5, 2015

Respectfully submitted,

/s/ Craig Tadlock  
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***Attorneys for Plaintiff PanTaurus LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 5th day of January, 2015.

/s/ Craig Tadlock  
Craig Tadlock